

1 Gregory N. Karasik SBN 115834
2 greg@spiromoss.com
3 Spiro Moss LLP
4 11377 W. Olympic Blvd., Fifth Floor
5 Los Angeles, CA 90064
6 Telephone: (310) 235-2468
7 Facsimile (310) 235-2456

8 Attorneys for Plaintiff
9 MICHAEL BATEMAN
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

29 MICHAEL BATEMAN, individually
30 and on behalf of all others similarly
31 situated,

32 Plaintiffs

33 v.

34 AMERICAN MULTI-CINEMA, INC.;
35 and DOES 1-10,

36 Defendants.

37 } Case No. CV 07-00171 JHN-AJWx
38 }
39 } **CLASS ACTION**
40 }
41 } **NOTICE OF MOTION AND**
42 } **MOTION FOR AWARD OF**
43 } **ATTORNEY'S FEES, COSTS AND**
44 } **ENHANCEMENT PAYMENT**
45 }
46 } Date: August 1, 2011
47 } Time: 10:00 a.m.
48 } Ctrm: 790 (Roybal)

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50 Please take notice that, on August 1, 2011, at 10:00 a.m. or as soon thereafter
51 as counsel may be heard, in Courtroom 790 in the Roybal Federal Building and
52 Courthouse, located at 255 E. Temple Street, Los Angeles, California, plaintiff
53 Michael Bateman ("Plaintiff") will and hereby does move for an award of attorney's
54 fees, costs and an enhancement payment in connection with final approval of the class
55 action settlement (the "Settlement") reached between Plaintiff and defendant
56 American Multi-Cinema, Inc. ("AMC") that was preliminary approved by the Court
57 on March 22, 2011. Specifically, Plaintiff moves for an order:

1. Awarding Plaintiff's counsel attorney's fees in the amount of \$1,380,000;
2. Awarding Plaintiff's counsel costs in the amount of \$19,675.50 and
3. Awarding Plaintiff an enhancement payment in the amount of \$7,500.

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5 Plaintiff's motion is made on the grounds that the provisions in the Settlement
6 authorizing awards of attorney's fees and costs to Plaintiff and an enhancement
7 payment to Plaintiff are fair and reasonable under Rule 23(e) of the Federal Rules of
8 Civil Procedure and the amount of fees and costs requested by Plaintiff's counsel are
9 reasonable under Rule 23(h) of the Federal Rules of Civil Procedure. Plaintiff's
10 motion is based on this Notice; the Memorandum of Points and Authorities and
11 Declaration of Gregory N. Karasik submitted herewith; all other pleadings and papers
12 on file in this action; and any oral argument or other matter that may be considered by
13 the Court.

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15 Dated: June 27, 2011

SPIRO MOSS LLP

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By: /s/ Gregory N. Karasik
Gregory N. Karasik

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Attorneys for Plaintiff

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